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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JAYSEN ALEXANDER PATTERSON,

Petitioner,

vs.

CALVIN JOHNSON, *et al.*,

Respondents.

Case No.: 2:20-cv-01614-JAD-DJA

**ORDER GRANTING UNOPPOSED
MOTION FOR ENLARGEMENT OF
TIME TO FILE REPLY IN SUPPORT OF
MOTION TO DISMISS SECOND
AMENDED PETITION (ECF NO. 36)**

(ECF No. 49)

Respondents move this Court for an enlargement of time of 21 days from the current due date of May 26, 2022, up to and including June 16, 2022, to file their reply in support of the motion to dismiss Jaysen Patterson's Second Amended Petition for Writ of Habeas Corpus (ECF No. 36). This Motion is made pursuant to FED. R. CIV. P. 6(b) and Rule 6-1 of the Local Rules of Practice and is based upon the attached declaration of counsel. This is the second enlargement of time sought by Respondents to file the reply, and the request is brought in good faith and not for the purpose of delay.

DATED: May 4, 2021.

AARON D. FORD
Attorney General

By: /s/ Trisha Chapman
Trisha Chapman (Bar No. 12716)
Deputy Attorney General

DECLARATION OF TRISHA CHAPMAN

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

I, TRISHA CHAPMAN, being first duly sworn under oath, deposes and states as follows:

1. I am an attorney licensed to practice law in all courts within the State of Nevada and am employed as a Deputy Attorney General in the Office of the Nevada Attorney General. I have been assigned to represent Respondents in *Jaysen Patterson v. Calvin Johnson, et al.*, Case No. 2:20-cv-01614-JAD-DJA, and as such, have personal knowledge of the matters contained herein.

2. This Motion is made in good faith and not for the purpose of delay.

3. The deadline to file a reply in support of Respondents' motion to dismiss is May 26, 2022.

4. I have been unable with due diligence to timely complete the reply herein. Since the last extension, I spent time preparing for an oral argument that was ultimately submitted on the briefs in *Mosby v. Perry Russell*, 20-16894. I filed responses in the following federal cases: *Hogarth v. Calvin Johnson*, 2:21-cv-00251-KJD-EJY (motion to dismiss); *Perez-Marquez v. Jo Gentry*, 2:17-cv-01501-RFB-BNW (motion to dismiss, motion to suspend the reply briefing and non-opposition to a motion to stay the proceedings); *Devose v. William Hutchings*, 2:21-cv-02069-APG-DJA (motion to dismiss). I also completed a motion to dismiss in *Hosino v. Tim Garrett*, 2:21-cv-002234-GMN-VCF that barring any unforeseen circumstances will be filed on May 31, 2022. In addition to these federal responses, I also filed responses out of the Eighth Judicial District Court in the following state habeas cases: A-22-850122-W, A-22-850118-W, A-22-851540-W, A-22-851370-W and I completed a response in A-22-851613-W that barring any unforeseen circumstances will be filed on May 26, 2022.

5. The foregoing responses took me longer than anticipated to complete, which impacted my ability to timely file the reply brief in this case. In addition to this reply, I'm also actively working on a motion to dismiss in *Johnson v. William Hutchings*, 2:21-cv-00707-APG-EJY and an answer in *Thompson v. Jerry Howell*, 2:21-cv-00511-GMN-NJK.

6. Lastly, the Supreme Court of the United States just issued a decision in *Shinn v. Ramirez*, 596 U.S. __ (2022), on May 23, 2022, that appears to directly impact one of the issues in this case. I need additional time to familiarize myself with the case and its possible impact on this case, which will help

1 the court better resolve the pending motion to dismiss.

2 7. I contacted counsel for Patterson regarding this request and she has no objection.

3 8. For the foregoing reasons, I respectfully request an enlargement of time of 21 days, up to
4 and including June 16, 2022, to file a reply in support of Respondents' motion to dismiss.

5 Executed on 5/26/2022.

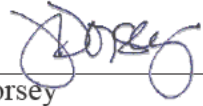
6 /s/ Trisha Chapman

7 Trisha Chapman (Bar No. 12716)

8 Deputy Attorney General

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10 **Order**

11 Good cause appearing, IT IS HEREBY ORDERED that the unopposed motion to extend the
12 deadline for Respondents to file a reply in support of their dismissal motion (ECF No. 49) is
13 **GRANTED**. The time for Respondents to file a reply to their dismissal motion is **EXTENDED to**
14 **June 16, 2022**.

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17 Jennifer A. Dorsey
18 United States District Judge
19 Dated: May 27, 2022
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